

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

SEIFULLAH CHAPMAN,

Movant,

v.

UNITED STATES,

Respondent

Criminal Case No. 03-296-A

MOTION FOR REDUCTION OF SENTENCE PURSUANT TO 18 U.S.C. § 3582(C)(2)

Movant Seifullah Chapman, through counsel, hereby moves the Court to reduce his sentence pursuant to 18 U.S.C. § 3582(c)(2). In support of this motion, Mr. Chapman submits the following:

1. Under § 3582(c)(2), the Court has authority to reduce sentences imposed under a term of imprisonment based on a sentencing range that has subsequently lowered by the sentencing commission.
2. Mr. Chapman is currently serving a 65 year sentence in federal custody for the following offenses: (1) one count of conspiracy charged under 18 U.S.C. § 371, (2) one count of conspiracy to provide material support in violation of 18 U.S.C. § 956, (3) one count of conspiracy to possess and use firearms in connection with a crime of violence in violation of 18 U.S.C. § 924(o), and (4) two counts of possession of a firearm in furtherance of a crime of violence in violation of 18 U.S.C. § 924(c).

3. The two conspiracy counts served as the predicate crimes for the two sentencing enhancements under § 924(c).
4. The Supreme Court, through *Dean v. United States*, 137 S. Ct. 1170 (2017), has effectively lowered the sentencing guidelines for § 924(c) predicate crimes, permitting a reduction under § 3582(c)(2).
5. In support of this motion, Mr. Chapman concurrently files a Brief in Support of Motion for Reduction of Sentence Pursuant to 18 U.S.C. § 3582(C)(2), which more fully provides the basis for his requested relief and the applicable law.

WHEREFORE, for the foregoing reasons, Mr. Chapman requests that the Court grant this Motion to Reduce Sentence pursuant to 18 U.S.C. 3583(c)(2) and resentence him as laid out in the accompanying Brief in Support of Motion for Reduction of Sentence Pursuant to 18 U.S.C. § 3582(C)(2).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2018, I electronically filed the foregoing with the Clerk of the Court for the Eastern District of Virginia using the CM/ECF system, which will send notification of such filing to the following:

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